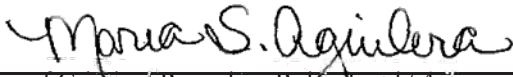


CRIMINAL COMPLAINT

SEIZED

United States District Court	DISTRICT of ARIZONA
United States of America v. Luis German Palomo-Cantuna; YOB: 1992; Citizen of Ecuador	DOCKET NO. MAGISTRATE'S CASE NO. 25-07227MJ
Complaint for violation of Title 8, United States Code § 1325(a)(1)	
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION: On or about July 12, 2023, at or near Lukeville, Arizona, in the District of Arizona, Luis German Palomo-Cantuna , an alien, did knowingly and voluntarily enter the United States at a time and place other than as designated by Immigration Officers of the United States, in violation of Title 8, United States Code, Section 1325(a)(1) (Improper Entry by Alien), a petty offense.	
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED: On or about July 12, 2023, at approximately 1:01 a.m., United States Border Patrol Agents (BPAs) assigned to the Ajo Station, encountered Luis German PALOMO-Cantuna , a citizen of Ecuador, near Lukeville, Arizona. BPAs determined that PALOMO had unlawfully entered the United States of America near Lukeville from Mexico at a time and place other than as designated by the Secretary of Homeland Security of the United States of America. PALOMO was apprehended within a group of thirty-one (31) individuals. After determining that PALOMO was an alien who illegally entered the United States of America, PALOMO was arrested and transported to the Tucson Coordination Center in Tucson, Arizona for further processing.	
Continued on next page.	
MATERIAL WITNESS(ES) IN RELATION TO THE CHARGE:	
DETENTION REQUESTED <i>Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.</i>	SIGNATURE OF COMPLAINANT MICHAEL W KRAUSE <small>Digitally signed by MICHAEL W KRAUSE Date: 2025.03.07 15:13:13 -07'00'</small>
	OFFICIAL TITLE & NAME: Special Agent Michael Krause
Subscribed to and sworn before me telephonically.	
SIGNATURE OF MAGISTRATE JUDGE ¹⁾ 	DATE March 7, 2025

¹⁾ See Federal rules of Criminal Procedure Rules 3 and 54

Continued from front page.

Record checks were performed on **PALOMO**, and it was determined that he had no known criminal history or record of deportable/excludable alien within the United States. Furthermore, there is no record of **PALOMO** in any Department of Homeland Security database to suggest that he obtained permission from the Secretary of the Department of Homeland Security to enter, pass through, or remain in the United States. Had **PALOMO** presented himself at a Port of Entry, Department of Homeland Security records likely would reveal that information. Accordingly, your affiant believes that **PALOMO** unlawfully entered the United States at a time or place other than as designated by Immigration Officers of the United States of America. **PALOMO** was served with a Notice to Appear/Released on Own Recognizance due to lack of space and placed in removal proceedings, per Section 212 (a) (6) (A) (i) of the Immigration and Naturalization Act (INA).

PALOMO was provided written notification of the time, date, and location of **PALOMO**'s removal hearing. INA §§ 239(a)(1), (2). Despite the written notification provided, **PALOMO** failed to appear at the hearing, and no exceptional circumstances were shown for the failure to appear. INA § 240(e)(1). On July 2, 2024, Immigration Judge Maria Lurye of the United States Department of Justice Executive Office for Immigration Review New York – Federal Plaza Immigration Court entered an order of removal from the United States on **PALOMO**.